

To: DeVaney, Rainie[rdevaney@mt.gov]
From: Kusnierz, Lisa
Sent: Mon 10/31/2016 10:08:35 PM
Subject: FW: TKN

Going through emails and came across this response from the BER regarding low RRVs for TKN. Thought you might be interested.

From: Laidlaw, Tina
Sent: Friday, July 15, 2016 12:38 PM
To: Kusnierz, Lisa <kusnierz.lisa@epa.gov>
Subject: TKN

Required reporting limits in Table 12A-3 of Department Circular DEQ-12A for total kjeldahl nitrogen (TKN) are not obtainable and should not be adopted in rule.

RESPONSE: The board agrees and has increased the required reporting value (RRV) for TKN from 150 µg/L to 225 µg/L. The board is aware that the typical practical quantitation limit for total kjeldahl nitrogen (TKN) is 0.5 mg/L, or 500 µg/L. However, this limit is not low enough to meet some nitrogen standards proposed in Department Circular DEQ-12A. If a reporting limit is greater than or equal to an applicable standard, state waters that have non-detectable levels of TKN may be unnecessarily listed as impaired and/or may have requirements for extensive sampling. This is why the board calculates an RRV for parameters which have numeric standards. The board has worked with the department and statewide analytical laboratories to derive the updated RRV. The board understands that this number is still very low and that conditions must be optimal in order to achieve this number. Reporting value concentrations higher than 225 µg/L may also be acceptable on a case-by-case basis, as indicated in Table 12A-3 of Department Circular DEQ-12A. Additionally, if a sample must be diluted, it is understood that the reporting limit will be raised.